

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff,

v.

ARISTA NETWORKS, INC.,

Defendant.

CIVIL ACTION NO. 6:20-cv-01083-ADA

Declaration of Shawn D. Blackburn

1. I am over the age of 18, and am competent in all respects to make this declaration. This declaration is true and correct and based on my personal knowledge.
2. I am an attorney licensed to practice law in the State of Texas. I represent WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”), the plaintiff in this matter. I make this declaration in support of Brazos’s Responsive Claim Construction Brief (“the Response”). I am familiar with the exhibits below in my role as an attorney for Brazos in this case.
3. Exhibit 1 to the Response is a true and correct copy of U.S. Patent No. 7,409,715.
4. Exhibit 2 to the Response is a true and correct copy of U.S Patent No. 8,472,447.
5. Exhibit 3 to the Response is a true and correct copy of U.S Patent No. 9,450,884.
6. Exhibit 4 to the Response is a true and correct copy of an excerpt from the file history of the ’447 Patent.
7. Exhibit 5 to the Response is a true and correct copy of HardDiskDirect, 00FG624 - IBM FLEX SYSTEM CHASSIS MANAGEMENT MODULE, available at <https://harddiskdirect.com/00fg624-ibm-flex-system-chassis-management-module.html> (last accessed Aug. 6, 2021).

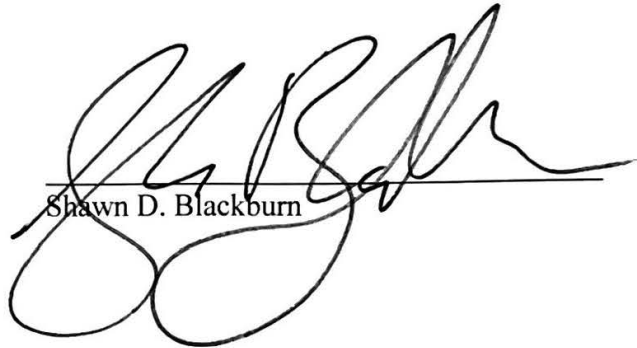
8. Exhibit 6 to the Response is a true and correct copy of DirectMacro, OS8800-CMM - ALCATEL OS8800 CHASSIS MANAGEMENT MODULE (REFURBISHED), available at <https://directmacro.com/os8800-cmm-alcotel-os8800-chassis-management-module-refurbished.html> (last accessed Aug. 6, 2021).
9. Exhibit 7 to the Response is a true and correct copy of DirectMacro, OS9800-CMM - ALCATEL-LUCENT OS9800 CHASSIS MANAGEMENT MODULE, available at <https://directmacro.com/os9800-cmm-alcotel-lucent-os98.html> (last accessed Aug. 6, 2021).
10. Exhibit 8 to the Response is a true and correct copy of Lenovo, *Flex System Chassis Management Module User's Guide*, (7th ed. 2020).
11. Exhibit 9 to the Response is a true and correct copy of Alcatel, *OmniSwitch® 8800*, (Apr. 2004).
12. Exhibit 10 to the Response is a true and correct copy of Alcatel, *OmniSwitch® 9000/9000E*, (Aug. 2009).
13. Exhibit 11 to the Response is a true and correct copy of Acatel-Lucent, *Alcatel-Lucent OmniSwitch 9900 Series*, (Dec. 2019).
14. Exhibit 12 to the Response is a true and correct copy of U.S. Patent No. 7,173,817.
15. Exhibit 13 to the Response is a true and correct copy of U.S. Patent No. US 7,398,401.
16. Exhibit 14 to the Response is a true and correct copy of U.S. Patent No. 8,166,539.
17. Exhibit 15 to the Response is a true and correct copy of Kawasaki et al., *ATCA Survey Systems for Telecommunications Services*, 47 FUJITSU SCI. TECH. J. 215 (2011).
18. Exhibit 16 to the Response is a true and correct copy of Norton et al., *Blade Management Controller Rides FPGA Embedded Processor*, 68 XCELLENCE IN WIRED COMMS 14, (2009).

19. Exhibit 17 to the Response is a true and correct copy of Banikazemi et al., *Sysman: A Virtual File System for Cluster System Management*, IBM RESEARCH REPORT, (2007).
20. Exhibit 18 to the Response is a true and correct copy of Lenovo, *ThinkSystem SN550 Compute Node Setup Guide*, (2017).
21. Exhibit 19 to the Response is a true and correct copy of Sandeep Singh, *What is Chassis Management Controller in UCS*, CISCO (2009).
22. Exhibit 20 to the Response is a true and correct copy of IBM, *BLADECENTER CHASSIS MANAGEMENT*, (2005).
23. Exhibit 21 to the Response is a true and correct copy of Banikazemi et al., *Sysman: A Virtual File System for Managing Clusters*, USENIX ASSOCIATION, (2008).
24. Exhibit 22 to the Response is a true and correct copy of Lennart Johnsson, Professor, Univ. of Houston, *The Impact of Moore's Law and Loss of Dennard Scaling*, (Feb. 6, 2015).
25. Exhibit 23 to the Response is a true and correct copy of Hasegawa et al., *IP Service Control Point and Signaling Gateway for IP Common Channel Signal Network*, 7 NTT DOCOMO TECH. J. 27 (2006).
26. Exhibit 24 to the Response is a true and correct copy of Microsoft Press Computer Dictionary (3d ed. 1997).
27. Exhibit 25 to the Response is a true and correct copy of IBM Dictionary of Computing 10th ed. (1994).
28. Exhibit 27 to the Response is a true and correct copy of CISCO, *Nexus 7000: M3 Multicast Forwarding*, at 6 (2017).
29. Exhibit 26 to the Response is a true and correct copy of Arista, *Arista 7050X Switch Architecture ('A day in the life of a packet')* (2014).

30. Exhibit 28 to the Response is a true and correct copy of an excerpt from the file history of the '884 Patent (2016-03-30 Applicant Arguments/Remarks Made in an Amendment).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 16th day of August, 2021 in Spring, Texas.



Shawn D. Blackburn